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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;
23 ANTHONY MIRANDA, an individual;
24 ERIC HANS, an individual; GARY
25 BRENNAN, an individual; OSCAR A.
26 BARRETTO, JR., an individual;
27 ISABELLE R. BARRETTO, an
28 individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF GARY
BRENNAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 4, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J. Carney

DECLARATION OF GARY BRENNAN

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2 1. I, Gary Brennan, am a plaintiff in the above-entitled action. I make this
3 declaration of my own personal knowledge and, if called as a witness, I could and
4 would testify competently to the truth of the matters set forth herein.

5 2. I am a current resident of San Diego County, California.

6 3. I am a law-abiding adult who is not prohibited from owning firearms under
7 the laws of the United States of America or the state of California. I have never
8 been found by any law enforcement agency, any court, or any other government
9 agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am
10 an approved CCW instructor for the San Diego County Sheriff's Department. I am
11 a member of the California Rifle & Pistol Association, another plaintiff in this
12 matter.

13 4. I have a valid and current California concealed carry weapon ("CCW")
14 permit issued by the San Diego County Sheriff's Department.

15 5. I legally carry a concealed firearm with me on a daily basis, so that I may be
16 armed and be able to defend myself and potentially others in the event of a life-
17 threatening emergency situation. Prior to SB 2, I only didn't carry my pistol when
18 planning on going to one of the few places where carry was not permitted, such as a
19 school or courthouse, or when I intended to have a drink with dinner.

20 6. Because SB 2 would prohibit me from carrying in many places where I am
21 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus
22 my right to be armed for self-defense in public, will be outright eliminated in nearly
23 all common contexts.

24 7. For example, under SB 2 I cannot carry in any establishment where alcohol is
25 served, even if I do not intend to drink. That means I cannot conceal carry at most
26 of the restaurants that I patronize on a regular basis, nor can I even carry in the
27 parking area of such establishments.

28 8. Those two provisions of SB 2 are hardly the only two that will impact me. I

1 can't carry while I stop at a gas station to fill up my car, because most gas stations
2 sell lottery tickets inside, making them off-limits for carry. Under SB 2, carry is
3 also prohibited at urgent care facilities which I have utilized in the past for medical
4 attention and would use in the future. Carry is also prohibited at financial
5 institutions such as my local bank that I frequent, and a variety of other places that I
6 regularly visit.

7 9. I am the President of the San Diego County Wildlife Federation, a position
8 that involves frequent hikes through public lands. While I understand that SB 2 has
9 an exception for lands available for hunting or shooting ranges, much of the land I
10 hike and travel through, whether in my roles as President of the Federation or just
11 recreationally, does not qualify for this exception. As I am sometimes alone in the
12 wilderness, or with just a small amount of people, the need for effective self-
13 defense against criminal attack or an attack by a wild animal is a major concern. SB
14 2 has taken that away from me.

15 10. My role as President of the Federation also sometimes involves me
16 depositing large sums of money at banks besides just my local bank. When I do so,
17 I'd like to be able to defend myself in case someone tries to harm me to steal that
18 money. SB 2 does not allow me to do so.

19 11. These are, of course, just a few examples of how SB 2 affects me, and as I
20 go about my daily life, I am sure to discover several more. SB 2 has essentially
21 destroyed my constitutional right to carry, as so few of the places I go to on a daily
22 basis will permit carry, and I don't want to expose my firearm to theft by constantly
23 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would
24 continue to carry in all of these places as I did before the law took effect.

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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on September 29, 2023.

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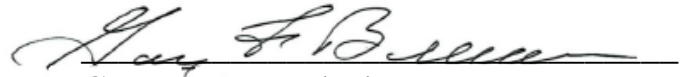
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Gary Brennan, declarant

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

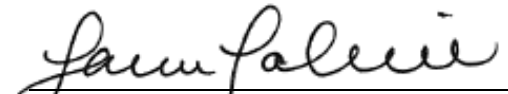
**DECLARATION OF GARY BRENNAN IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.



Laura Palmerin